



April 4, 2018

Don Gibbs - Plant Manager
Container Life Cycle Management - St Francis Facility
3950 S. Pennsylvania Avenue
St. Francis, WI 53235

RE: 2017 Air Emissions Inventory Report - FID 341158070

Dear Mr. Gibbs,

The purpose of this letter is to inform you that the Department of Natural Resources (department) have previewed the 2017 Air Emissions Inventory for your facility; Container Life Cycle Management LLC (CLCM) located at 3950 S. Pennsylvania Ave., Saint Francis, WI.

Based on this preview, the department has a number of comments and questions as to the methodology being used to estimate and report air pollution emissions. Specifically, we request you review the following and respond within 15 business days to each of the following in writing and revise the electronic 2017 Air Emissions Inventory Report within the WAMS database:

1) Fugitive Emissions:

Submit a quantified estimate of VOC and related VOC-HAP indoor fugitive emissions for the following devices/sources:

- P12 - Water Heater 4
- P13 - Water Heater 3
- P14 - Water Heater 2
- P15 - Water Heater 1
- P11 - Bung Wash
- P72 -Exterior Wash/Soaker [steel drums only]
- P73 -Exterior Rinse [steel drums only]
- P74 -Internal Double Split Washer (P74) [steel drums only]
- P80A -Internal Caustic Drum Washer
- P80B - Exterior Washer/Soaker
- P80C - Exterior Rinse

- i) Venting open drum contents
- ii) Drum content emissions during dumping into sump
- iii) Initial rinse
- iv) Interior Acid post rinse with hot rinse solution (tank 1)
- v) Poly can shredding/recycling
- vi) Filter Press
- vii) Waste Water Pretreatment
- viii) Other miscellaneous fugitive sources attributable to VOCs release from (in process) circulated hot rinse solutions containing VOCs.

If a conservative facility wide factor is used, please provide supporting documentation to account for the justification of this estimate along with the formula and assumptions used in this approximation. A fugitive process may be added/used in the air emissions inventory to report this facility wide value. If fugitives are included in this value, the facility must also maintain onsite detailed records with references and supporting documentation used to estimate fugitive emissions from each device.

2) Process Emissions

A) For each of the devices identified below, please define the unit of throughput and respective units of measure, how this throughput value was determined, the 2017 annual throughput value, each applicable air pollutant emission factor (including units), the percent control efficiency (air pollutant specific), and the resulting emissions. Provide an explanation of any product blend (chlorinated solvent blend) to help describe each respective air pollutants origin, if appropriate.

- i) P44 - Label Stripping
- ii) P45 - Drum Wipe Cleaning
- iii) P99 - 01 Drum Acid Etching
- iv) P99 - 02 Drum Residuals (NOTE: *Review requested changes in B) below before answering*)

B) For each device identified below, update the Source Classification Code (SCC) and/or device/process emission as requested. In some instances, there are multiple applicable SCC codes used to define several sources of potential emissions for a device. In these cases, add a process for each to capture these within the air emissions inventory report. Also include each air pollutant, respective emission factor, and maintain onsite the reference documentation.

- i) P12, P13, P14, P15, P42C, Water Heaters - Switch the SCC code from 10100602 to **10200602**. (Emission sources are not electrical generating units, rather industrial type sources).
- ii) P41 Switch the SCC code from 10100602 to **40201001**. (Emission source is not an electrical generating unit).
- iii) P44 Surface Preparation - Switch the SCC code from 40100256 (degreasing) to **40100399** (stripping).
- iv) P75 Acid Etching - Switch SCC code from 40100499 to **30101199**.
- v) P71 Relabeling/Surface Preparation - Switch SCC code from 40201805 to **40100310** (Stripping with Acetone).
- vi) P32C Surface Coating - Switch SCC code from 40200110 (General) to the following and include related processes for each SCC code:
40202601 (Coating Operation)
40202603 (Coating Mixing)
40202605 (Equipment Clean-up) In addition to any VOCs also identify acetone usage.
40202607 (Exterior coating)
- vii) Coating Drying Oven - Switch SCC code from 10100602 to **40201001**. Report emissions from the combustion of natural gas as well as the HAPs liberated from the coating during curing. The HAP reporting may be reported here. Maintain documentation for HAPs generated/liberated from the paint reaction/curing onsite.

viii) P99/02 Drum Residuals - Switch SCC code from 30300001 (Aluminum Ore) to **30600504** (1000 barrels) and provide the stack test emission factor value for the appropriate emissions. Maintain emission factor and detailed information on site. Include a capture efficiency for this process.

If you believe the SCC code is not truly representative of the process and will aid in reporting emissions, substitute an alternative with reasoning and appropriate emission factor.

If you have any questions, please contact me at (414) 263-8554.

Sincerely,



Michael Griffin
Air Management Engineer
Southeast Region Air Program, Milwaukee Service Center

Cc: Casefile

Kendra Fisher, AM - Waukesha Service Center (via email)
James Bonar-Bridges - LS/8 (via email)
Jessica Kramer - Wisconsin DOJ (via email)
Anne Van Grinsven - Oshkosh Service Center (via email)
Linda Benfield, Foley & Lardner LLP (via email)
Eric Olson - EPA Region 5 (via email)